

REMARKS

This paper is responsive to the Final Office Action dated May 19, 2011. No extensions of time and/or additional claim fees are believed to be due, however, the Commissioner is hereby authorized to treat this paper as a Petition for any needed extension of time and to charge any fees due to Deposit Account No. 50-0959, Attorney Docket No. 109769.0020.

Claims 1 through 5, 8 through 14 and 23 through 27 are pending in this application. Claims 3 and 4 have been cancelled. Claims 1, 9 and 14 have been amended. Support for the amendments to claims 1, 9 and 14 can be found in the specification as filed. Accordingly, no new matter has been added. As such, entry of the amendments and consideration of the remarks which follow is respectfully requested.

I. The 35 U.S.C. § 103(a) Rejections:

Claims 1 through 5 and 8 through 26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,311,214 (Rhoads), U.S. Patent No. 6,494,571 (Finkel) and U.S. Patent No. 6,704,120 (Leone). Rhoads discloses encoded greeting cards which, when read by an image capture device of a computer, prompts the display of a corresponding web page or other computerized representation. Finkel describes a printing method and program wherein a user can set the print area of the image to be printed to be larger than the primary printable areas and to extend beyond perforations in the print paper to achieve end-to-end printing. Leone discloses a data template for a personalized printed product incorporating image processing operations. More specifically, Leone discloses an applet operating from a web browser, which provides functions to add graphical elements to a printed product.

Claims 1, 7, 9 and 14 have been amended to replace the qualifier “first” as in “first program” with the term “plug-in” to distinguish program as being a plug-in program. Applicant is of the opinion that the use of Leone in rejecting the claims of the present application is improper. According to the American Heritage Science Dictionary © by Houghton Mifflin Co., the definition of the term “applet” is, “a small computer program that has limited features , requires limited memory resources, and is designed to be downloaded from the Internet to run on a webpage. *An applet cannot read or write data on the user’s machine.*” (emphasis added) To the contrary, the present invention, discloses using a plug-in to create customized printable

products. More specifically, when a user connects to a web page, he/she is offered a variety of greeting card genres from which he/she can select, and a variety of greeting card options provided within each genre. Once a greeting card has been selected by the user, the appropriate plug-in program, including engine and assembly component programs, is downloaded to the user's computer to make certain design elements available in the browser which will enable the user to edit the selected greeting card. In fact, the plug-in may be downloaded automatically when it is recognized that the browser does not have the plug-in installed or does not have the latest version of the plug-in installed. Also, as is recited in claim 1, the first program controls the downloading to the client computer of the defining data that defines a selected printable product. Therefore, only the necessary "defining data", based on the user's selection of a printable product, is installed on the client computer. As disclosed in the specification, once the web server pre-assembles the design elements for a printable product selected by the user, an appropriate CPT file (compiled from the design element database located on the server) is generated and downloaded to the user's computer. If the present invention used an applet, as opposed to a plug-in program, the applet would not be permitted, for security reasons, to write permanent "defining data" or the appropriate CPT files to the user's computer.

In response to a similar argument made in response to the previous Office Action, Examiner finds that Applicant's arguments are directed to subject matter that is not claimed. However, Applicant is simply arguing the fundamental differences between an applet and a plug-in. The features recited by Applicant, namely, that a plug-in remains on the client computer while an applet is merely temporary, and that security features of an applet prevent it from writing data to a user computer, are inherent in the terms "applet" and "plug-in".

Neither Rhoads nor Finkel cure the deficiencies of Leone, therefore Applicant respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1 through 5 and 8 through 26.

Claim 27 is rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,552,994 (Cannon), U.S. Publication No. 2001/0034746 (Tsakiris) and "Helpers and Plug-Ins". This rejection should be withdrawn because neither of these references suggests or otherwise makes obvious the claimed subject matter. Claim 27 defines each of the attributes of the invention as a system for composition and printing of greeting cards. Claim 27 contains each of

the limitations of claims 1 through 26. Cannon discloses an electronic database of greeting card attributes which are selected prior to printing. It is not concerned with and does not teach or suggest editing and scaling of each panel of a greeting card by use of a plug-in program.

Tsakiris describes a generation of web cards (web pages read by mobile devices) used to expedite internet browsing requests with a mobile device by avoiding tedious input and clicking through hyperlinks. The reference to “web cards: has no correlation or relevance to paper greeting cards as defined by the present invention. Neither Cannon nor Tsakiris, nor the article “Helpers and Plug-Ins” teach the claimed combination of a plug-in program downloaded to a web browser, with the plug-in program including an engine and assembly component for selection and editing of assets of a greeting card, including selected greeting card design elements and asset information for display, editing and printing assembly for all panels of a greeting card, and printing assembly including scaling and resizing for division into greeting card panels for printing.

Also, claim 27 specifically requires the use of an internet web browser program (as opposed to a dedicated desktop publishing program) to create, edit, modify and print a greeting card by the use of a plug in program. The concept of using an internet web browser as an editing and printing program is not taught by the prior art, particularly as it applies to the selection, editing and printing of greeting cards. Therefore, Applicant respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejection of claim 27.

II. Conclusion

For at least the foregoing reasons, claims 1 through 5, 8 through 14 and 23 through 27 are believed to be in condition for allowance and a Notice of Allowance is respectfully requested. Should the Examiner wish to discuss any of the foregoing in more detail, the undersigned attorney would welcome a telephone call.

Respectfully submitted,
ROETZEL & ANDRESS

/JAMES C. SCOTT/

James C. Scott
Reg. No. 35,351
1375 E. Ninth Street
One Cleveland Center, 9th Floor
Cleveland, Ohio 44114
(216) 623-0150 (reception)
(216) 615-4832 (direct)
(216) 623-0134 (facsimile)

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